

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20104-BECERRA

UNITED STATES OF AMERICA

v.

ARCANGEL PRETEL ORTIZ, et al.,

Defendants.

**UNITED STATES' NINETEENTH RESPONSE
TO THE STANDING DISCOVERY ORDER**

The United States hereby files this nineteenth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16. Please note that the discovery is governed by a Protective Order (DE 26, 40, 164-171, 238). All pages are marked Restricted Material; certain pages are also marked 3500 Material, and such 3500 Material must be maintained by defense counsel and can only be viewed by the defendant in the presence of defense counsel (except as proposed by the government on April 4 and April 25, 2024). These productions supplement the discovery previously provided. *See* (DE 41, 52, 78, 92, 173, 174, 324, 326, 327, 425, 591, 667, 777, 812, 985, 1025, 1072, and 1131).

On July 22, 2025, the Government produced a hard drive containing digital evidence in response to two separate defense requests. First, in response to technical difficulties noted by the Coordinating Discovery Attorney ("CDA"), the Government has reproduced several devices, previously produced on July 1, 2025, in an alternate file format ("E01" files). Second, in response to another defense request, the Government has produced post-filter Cellebrite reports for two cellular telephones. On August 20, 2025, the Government produced a flash drive containing another Cellebrite phone report in response to a defense request for that specific phone. The

Government has provided defense counsel with an index that lists (a) the device name or a description of the digital recording; (b) the date of production; (c) the device owner, if known; and (d) the phone number, if the device is a phone and the Government knows that information—information that allows defense counsel to identify, isolate, and review whichever items they consider relevant to their clients’ defense.

In addition, on August 20, 2025, the Government produced approximately 190 pages of files, located between Bates No. USA000545245 and USA000545726, to the CDA via USAfx. These materials consist of: (1) Florida state business and DAVID records for several individuals and entities; (2) statements of defendant James Solages; and (3) various law enforcement interview reports, agent notes, and other miscellaneous items that represent early production of potential Jencks and *Giglio* material. These reports detail certain statements of third-party witnesses and co-conspirators regarding the events at issue in this matter. To the extent there are differences between those statements and the Government’s view of the evidence, and in an abundance of caution, those statements are also being provided pursuant to *Brady* and its progeny.

The Government will continue to produce discoverable material as appropriate on a rolling basis. The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, *Napue*, and the obligation to assure a fair trial.

Respectfully submitted,

JASON REDING QUIÑONES
United States Attorney

JOHN A. EISENBERG
Assistant Attorney General for the National
Security Division

By: /s/ Sean T. McLaughlin
Sean T. McLaughlin

/s/ Andrew Briggs
Andrew Briggs

Assistant United States Attorney
Court ID No. A5501121
11200 NW 20th Street, Suite 101
Miami, FL 33172
(305) 715-7642/7654
Sean.McLaughlin@usdoj.gov

/s Jason Wu

Jason Wu
Assistant United States Attorney
ID No. A5502299
99 NE 4th Street
Miami, FL 33132
(305) 961-9226
Jason.Wu@usdoj.gov

/s Altanese Phenelus

Altanese Phenelus
Assistant United States Attorney
FL Bar No. 112693
99 N.E. 4th Street
Miami, FL 33132
(305) 961-9375
altanese.phenelus@usdoj.gov

Trial Attorney
Court ID No. A5503251
National Security Division – Department of Justice
950 Pennsylvania Avenue
Washington, DC 20530
(202) 514-7739
Andrew.Briggs2@usdoj.gov

Certificate of Service

I hereby certify that on August 20, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and thereby served all counsel of record.

/s Jason Wu

Jason Wu
Assistant United States Attorney